

BOIES SCHILLER FLEXNER LLP

Mark C. Mao (CA Bar No. 236165)
mmao@bsflp.com
Beko Reblitz-Richardson (CA Bar No.
238027)
brichardson@bsflp.com
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Tel: (415) 293 6858
Fax: (415) 999 9695

SUSMAN GODFREY L.L.P.

William Christopher Carmody (pro hac vice)
bcarmody@susmangodfrey.com
Shawn J. Rabin (pro hac vice)
srabin@susmangodfrey.com
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Telephone: (212) 336-8330

MORGAN & MORGAN

John A. Yanchunis (pro hac vice)
jyanchunis@forthepeople.com
Ryan J. McGee (pro hac vice)
rmcgee@forthepeople.com
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Telephone: (813) 223-5505

*Counsel for Plaintiffs; additional counsel
listed in signature blocks below*

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Tel: (312) 705-7400
Fax: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Tel: (213) 443-3000
Fax: (213) 443-3100

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

*Counsel for Defendant; additional counsel
listed in signature blocks below*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

CHASOM BROWN, MARIA NGUYEN,
WILLIAM BYATT, JEREMY DAVIS, and
CHRISTOPHER CASTILLO, individually
and on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**JOINT STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
GOOGLE TO SUBMIT DECLARATION
IN SUPPORT OF PLAINTIFFS' MOTION
TO SEAL (DKT. 291)**

Judge: Honorable Susan van Keulen

Pursuant to Civil Local Rule 6-2, this joint stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, on October 14, 2021, Plaintiffs filed their Administrative Motion to Seal Portions of Plaintiffs’ Motion Seeking Relief for Google’s Failure to Obey Discovery Order (Dkts. 291-292).

WHEREAS, on October 14, 2021, Google received unredacted copies of Plaintiffs’ Motion Seeking Relief for Google’s Failure to Obey Discovery Order (Dkts. 291-292);

WHEREAS, pursuant to Civil Local Rule 79-5(e), the current deadline for Google, as the Designating Party, to establish that such designated material is sealable, is by Monday, October 18, 2021;

WHEREAS, the Parties agree that an extension of time of 7 days will provide Google with sufficient time to submit its declaration in support of its designated material in the filings (Dkts. 291-292);

NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall submit a Declaration in support of Plaintiffs’ Motion to Seal (Dkt. 291), to October 25, 2021.

DATED: October 15, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Andrew H. Schapiro
Andrew H. Schapiro (admitted *pro*
hac vice)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Tel: (312) 705-7400
Fax: (312) 705-7401

Stephen A. Broome (CA Bar No.
314605)
sb@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Tel: (213) 443-3000
Fax: (213) 443-3100

BOIES SCHILLER FLEXNER LLP

/s/ Mark C. Mao
Mark C. Mao (CA Bar No. 236165)
mmao@bsflp.com
Beko Reblitz-Richardson (CA Bar No.
238027)
brichardson@bsflp.com
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Tel: (415) 293 6858
Fax: (415) 999 9695

James W. Lee (*pro hac vice*)
jlee@bsflp.com
Rossana Baeza (*pro hac vice*)
rbaeza@bsflp.com
100 SE 2nd Street, Suite 2800
Miami, FL 33130
Tel: (305) 539-8400

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
 555 Twin Dolphin Drive, 5th Floor
 Redwood Shores, CA 94065
 Telephone: (650) 801-5000
 Facsimile: (650) 801-5100

Jomaire A. Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
 51 Madison Avenue, 22nd Floor
 New York, NY 10010
 Telephone: (212) 849-7000
 Facsimile: (212) 849-7100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
 1300 I Street NW, Suite 900
 Carl Spilly (admitted *pro hac vice*)
carlspilly@quinnemanuel.com
 Washington D.C., 20005
 Tel: (202) 538-8000
 Fax: (202) 538-8100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
 50 California Street, 22nd Floor
 San Francisco, CA 94111
 Tel: (415) 875-6600
 Fax: (415) 875-6700

Attorneys for Defendant Google LLC

Fax: (305) 539-1304

William Christopher Carmody (*pro hac vice*)
bcarmody@susmangodfrey.com
 Shawn J. Rabin (*pro hac vice*)
srabin@susmangodfrey.com
 Steven Shepard (*pro hac vice*)
sshepard@susmangodfrey.com
 Alexander P. Frawley (*pro hac vice*)
afrawley@susmangodfrey.com
 SUSMAN GODFREY L.L.P.
 1301 Avenue of the Americas, 32nd Floor
 New York, NY 10019
 Tel: (212) 336-8330

Amanda Bonn (CA Bar No. 270891)
abonn@susmangodfrey.com
 SUSMAN GODFREY L.L.P.
 1900 Avenue of the Stars, Suite 1400
 Los Angeles, CA 90067
 Tel: (310) 789-3100

John A. Yanchunis (*pro hac vice*)
jyanchunis@forthepeople.com
 Ryan J. McGee (*pro hac vice*)
rmcgee@forthepeople.com
 MORGAN & MORGAN, P.A.
 201 N Franklin Street, 7th Floor
 Tampa, FL 33602
 Tel: (813) 223-5505
 Fax: (813) 222-4736

Michael F. Ram (CA Bar No. 104805)
mram@forthepeople.com
 MORGAN & MORGAN, P.A.
 711 Van Ness Avenue, Suite 500
 San Francisco, CA 94102
 Tel: (415) 358-6913

Attorneys for Plaintiffs

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT DECLARATION IN SUPPORT OF PLAINTIFFS' MOTION TO SEAL (DKT. 291). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: October 15, 2021

By /s/ Andrew H. Schapiro
Andrew H. Schapiro
Counsel on behalf of Google

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

The deadline for Google to submit a Declaration in support of Plaintiffs' Motion to Seal (Dkt. 291) shall be extended to October 25, 2021.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____, 2021

Hon. Susan van Keulen
United States Magistrate Judge